

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

United States of America,

Defendant's proposed Voir Dire

1:14-CR-366 (MAD)

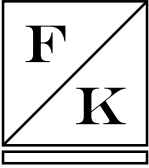
– against –

Shakir Michael,

Defendant.

The Defendant, as and for his proposed *voir dire*, respectfully submits the following:

1. What concerns would you have if you learned a witness had been convicted of a crime? Can such a witness be believed?
2. What concerns would you have if you learned a witness were addicted to drugs? Can such a witness be believed?
3. What concerns would you have if you learned that a witness were high on drugs when he claims to have observed something that he's here to testify about? Can such a witness be believed?
4. What concerns would you have if you learned that the government will use a witness that has pleaded guilty to a crime and has agreed to testify in exchange for a lower sentence recommendations from the government?
5. What concerns would you have if Mr. Michael did not testify? Why would it be important for you to hear someone say they did not do what the government accuses them of?
6. Our Constitution says Mr. Michael does not have to prove he did not commit the crimes he's accused of. Is that fair? Is it fair to make the government prove him guilty?
7. What are some reasons why someone could be falsely accused of a crime?
8. What are some reasons why a witness might lie on the witness stand?



9. Do you think some ethnicities or races are more prone to violence or crime than others?
10. Have you heard from other sources that the opinion that African Americans commit more crimes of violence than whites?
11. Do you believe that individuals should be permitted to possess drugs for their own use?
12. Have you or anyone close to you been a victim of a crime of violence? Involving a firearm?

Dated: January 31, 2015
Troy, New York

Respectfully submitted,

s/

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To:
Honorable Mae A. D'Agostino
United States District Court Judge
U.S. District Court
Albany, New York 12207

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